

West Michigan's Shoreline City www.shoretinecity.com

December 18, 2014

Environmental Management Support, Inc. Attn: Mrs. Edie Finedeis Cromwell 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

Re: U.S. EPA Brownfield Hazardous Substances and Petroleum Assessment Grant Proposal City of Muskegon Brownfield Redevelopment Authority, City of Muskegon, Michigan -- RFP No. OSWER-OBLR-14-07

Dear Mrs. Cromwell:

The City of Muskegon sits on the eastern shores of Lake Michigan, next to a natural deep-water port formed by Muskegon Lake. These natural resources were used extensively by Muskegon's earliest settlers who began a massive logging industry in the early 1800s. By the mid-1800s, 47 saw mills surrounded Muskegon Lake. Later, these waterfront properties were converted to other industries typically found in 20th century Midwestern towns – foundries, automotive parts manufacturers, electroplaters, chemical companies, a pulp paper mill, oil bulk plants, and a variety of manufacturers. This heavy industrial use of Muskegon's waterfront defined the City for decades. The economic woes of Michigan and changing global market paradigms took their toll on these operations and left behind blighted, contaminated lands, unemployment, and few resources to manage the challenges posed by these abandoned properties.

The decline of Muskegon's industrial heritage resulted in the abandonment of large industrial facilities that prevented access to the waterfront and even obscured the lake's visibility from the adjacent city center. Furthermore, as a result of the loss of their industrial base, the city suffered the decay of its traditional downtown. Redeveloping Muskegon has required bold and sweeping changes. For the last decade, the City of Muskegon has been doing just that - transforming its downtown and waterfront properties through a massive infrastructure and redevelopment project. These efforts have included razing large industrial properties, relocating a major highway (Business U.S. 31), constructing a 14-mile-long non-motorized multi-use trailway along the shoreline, demolishing a 23-acre downtown mall site, renovating and demolishing numerous center city buildings, realigning traffic patterns, reconstruction of roads, and upgrades to sewers, water mains, and other utilities. The City of Muskegon essentially created a blank canvas of several hundred acres on which to rebuild its downtown and connect the historical center of Muskegon to the shoreline of Muskegon Lake.

The rebuilding effort is a well thought-out plan developed through a concerted public outreach effort and over 20 years of strategic planning. The "new" Muskegon downtown is a modern urban center that showcases the lakefront shoreline, embraces the City's past and incorporates historical buildings, provides the modern amenities of an urban waterfront – entertainment, mixed use development, open spaces, public access to the waterfront – and creates new jobs and investment for its citizens. The City strives to make Muskegon a sustainable, equitable, diverse, and livable city; including energy efficiencies, publicly accessible trails, eco-friendly waterfront buffers and other improvements that are inclusively beneficial to all citizens.

This rebuilding effort, however, has been and will continue to be challenged by the fact that many of the lands being redeveloped were once part of Muskegon's industrial past and contamination has been found throughout the area. The City of Muskegon Brownfield Redevelopment Authority lacks adequate resources to help assess all these properties for future development. This Grant will provide a much needed source of funding to secure continued progress in the rebuilding of Muskegon's downtown and shoreline, and will help make the cost of development in downtown Muskegon competitive with greenspace development.

Already, there are many Muskegon redevelopment success stories. Over 40 redevelopment projects have been supported with state, local, and federal funds leveraging over \$130 million in private investment, creating over 1000 jobs, creating housing in the new downtown, and completing environmental cleanup and assessment activities on hundreds of acres of contaminated property. These successes, accomplished over the past decade, have now created momentum and excitement for future development and investment in the City of Muskegon not seen for the past 50 years. The EPA Assessment Grant will play a vital role in ensuring that this momentum does not falter. We thank you for this opportunity to detail the value this Assessment Grant will have to our Brownfield Redevelopment efforts, and look forward to maintaining the U.S. EPA as a valuable partner in the transformation of Muskegon, Michigan.

Respectfully Submitted

Ms. Cathy Brubaker-Clarke

Economic Development Director

Cothy Benbaler Clarke

City of Muskegon Brownfield Redevelopment Authority, 933 Terrace a. Applicant Identification:

Street, Muskegon, MI 49440 17270968

b. DUNS Number:

c. Funding Request:

i) Grant Type: Assessment ii) Amount \$400,000

iii) Contamination \$200,000 Hazardous Substance Assessment

\$200,000 Petroleum Assessment

iv) Community Wide

d. Location:

City of Muskegon

e. Not a site specific proposal

f. Contacts:

Project Director: Ms. Cathy Brubaker-Clarke, 933 Terrace, Muskegon, MI

49440, 231-724-6702 (p), 231-724-6970 (f), Cathy.brubaker-

clarke@shorelinecity.com

Chief Executive: Mr. Frank Peterson, City Manager, 933 Terrace, Muskegon,

MI 49440, 231-724-6724 (p), 231-724-1214 (f),

frank.peterson@shorelinecity.com

g. Date submitted: December 18, 2014 h. Project Period:

City of Muskegon – 37,046 (U.S. Census, 2012 Estimate) i. Population:

Three Years

j. Special Considerations: Refer to Attached Checklist

Ranking Criteria for Assessment Grants

1. Community Need

1.a Targeted Community and Brownfields

1.a.i Targeted Community Description

The City of Muskegon, Michigan, sits along the shores of Lake Michigan, next to a natural deepwater port formed by Muskegon Lake. With the advantage of the port and sheltered harbor, the City of Muskegon developed around Muskegon Lake and grew as a major West Michigan industrial center. The area's natural resources were exploited extensively by the earliest settlers, who began a massive logging industry in the early 1800s. By the mid-1800s, 47 sawmills surrounded Muskegon Lake. Later, these waterfront properties were converted to industries typical of 20th century Midwestern towns (foundries, automotive parts manufacturers, electroplaters, chemical companies, a pulp paper mill and a variety of manufacturers). During World War II, Muskegon's role in the "Arsenal of Democracy" supported a variety of industrial operations, including a large manufacturer of combat tanks (Teledyne). Industrial development of the Muskegon Lake shore involved cutting, filling, and dredging. It is widely known that much of the fill used to create lakeshore features and jetties was waste material originating from the industries that occupied the lakefront; mostly foundry sand and sawmill debris. Heavy industrial use of the waterfront defined Muskegon for decades, preventing use of this natural resource for leisure activities, tourism, entertainment, and greenspace. Throughout the 1980s and 1990s, economic decline and obsolescence of older manufacturing buildings took their toll and left a legacy of blighted, contaminated lands along Muskegon's shoreline, separating the Lake from the City's downtown.

The City of Muskegon's target community is this former industrial waterfront which is now the downtown business district and adjoining waterfront. The census tract (04200) comprising the target community has a total population of 3,963 (2010 census) and encompasses the downtown business district, the adjoining waterfront, and two neighborhoods - the Nims and Nelson Neighborhoods. The target community has been the epicenter of Muskegon's transformation which has included demolition of a 23-acre mall site, demolition of multiple industrial properties on the waterfront, construction of a 14-mile non-motorized trail system, realignment of roads and a major highway, rehabilitation of historic downtown buildings, and new construction of downtown buildings and a farmers market. This transformation is resulting in restoration of the traditional downtown and opening the waterfront to new public uses and private development. Added to the challenges is the looming decommissioning of a 320 megawatt power plant in 2015. This will result in 300 acres of waterfront land that will need to be redeveloped in the future.

1.a.ii Demographic Information

	Census Tract – 04200 (Target Area)	City of Muskegon	Statewide (Michigan)	National
Population	3,9636	37,2134		308,745,5381
Unemployment	24.3%6	6.1 (August 2014) ²	7.4% (August 2014) ²	6.7%2
Poverty Rate	37.57%6	34.3%4	16.3% ²	11.8% ³
Percent Minority	56.25% ⁶	42.95 ⁵		26.7% ¹
Median Household Income	\$18,8396	\$25,4805	\$48,4711	\$ 51,371 ³

¹Data is from the 2010 U.S. Census data and is available at www.census.gov/

Census Tract Data is from http://www.usa.com/MI121004200.html

The low income neighborhoods (the poorest in Muskegon) that make up our target area earn far less than other city residents, the State, or Nation, and residents are far more likely to be in poverty compared to State and National averages. Unemployment rates in these neighborhoods are significantly higher than other places in the City, State or National rates. By comparison, the neighborhood across Muskegon Lake, a community known as North Muskegon, has a median household income of \$56,600

²Data is from the Bureau of Labor Statistics and is available at www.bls.gov

³Data is from the 2010 American Community Survey and is available

http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html

^{*}Data is from the QuickFacts U.S. Census 2012 Estimate http://quickfacts.census.gov/

Data is from www.usa.gov

(www.usa.com). Although they share similar characteristics such as lakefront access, proximity to a major transportation routes and employment centers, residents in the **target area** earn less than their fellow citizens and are more likely to be unemployed or underemployed. The City of Muskegon has a larger minority population as a percentage than most communities in Michigan and the target community mirrors this demographic. City-wide, residents earn less and are more likely impoverished compared to others in the State and Nation. Muskegon and the target area is a community with needs for improved economic opportunities, jobs and earnings. The continued transformation of the target community is needed to create those opportunities and redevelopment of brownfields is one important component in that effort.

1.a.iii Brownfields

The Michigan Department of Environmental Quality (MDEQ) Database has identified 109 Muskegon County locations with contamination from hazardous substances such as solvents, metals, PCBs and other contaminants, and 64 of those sites are located in the City of Muskegon. An additional 106 leaking underground storage tank (LUST) sites are located in the City (michigan.gov/DEQ). Prior Brownfield inventory efforts documented in the Brownfield Analysis Master Plan study identified 14 large (5-20 acres) Brownfield Sites and 19 LUST sites within the downtown business district and adjoining waterfront (target area). Specifically, these sites include former dry cleaners, gas stations, industrial machine shops, areas of industrial fill, a former manufactured gas plant, defunct gas stations, and large former industrial complexes. Of the identified contaminated sites in the Brownfield Analysis Master Plan, several sites have chlorinated solvent or petroleum groundwater contaminant plumes emanating from the source that present a vapor intrusion hazard. Uncontrolled industrial fill areas and abandoned structures may allow heavy metal-bearing dusts and asbestos fibers to become airborne and affect residents in the target community. These substantive risks present a real cost to developers who will require effective land use controls, engineering controls and cleanup plans to restore these properties to safe and effective use. The majority of the identified sites have no liable party and incomplete assessments or cleanup activities. The lack of assessment data creates a perception of environmental impact that may be alleviated with better or more current data. The lack of data also prevents developers from quantifying costs associated with potential environmental controls and cleanup, further discouraging redevelopment of these sites.

	Known or Suspected Contaminants
Downtown Business District and Waterfront –	Polynuclear aromatic hydrocarbons, chlorinated solvents,
Former Mall Site, Vacant downtown lots,	lead and heavy metals, cyanides, phenols, nitrobenzene,
Lakefront	phthalates, formaldehyde and PCBs, fill materials
Downtown Business District and Waterfront – W.	Tetrachloroethylene
Clay Avenue former industrial dry cleaner	·
B.C. Cobb Plant	Polynuclear aromatic hydrocarbons, lead, other heavy
	metals, coal ash
Leaking UST sites	Benzene, petroleum solvents, lead

*ATSDR Profiles

1.a.iv Cumulative Environmental Issues

Citizens in the target community are exposed to additional environmental hazards beyond the identified brownfield sites. Area-wide studies have demonstrated that large tracts of land are "constructed lands" as the result of changes made to the lakefront to suit industrial activities. Much of the "made land" is from industrial wastes such as ash, slag, foundry sand, etc. As residential neighborhoods sprang up around these former industrial sites, there is a strong potential that some of these homes rest on top of these made lands and residents would be exposed to heavy metals and other compounds.

A major coal-fired power plant exists in the target community – Consumers Energy's B.C. Cobb Power Plant. The power plant is a potential source of particulates and other contaminants affecting local air quality. This plant is scheduled for shut down as a consequence of air quality control requirements that cannot be met at this location.

Groundwater impacts and uncontrolled stormwater run-off adversely affect the ecology of the nearby surface waters. Several small creeks and drains discharge into Muskegon Lake and can carry

contaminated sediments into the Lake, impacting wildlife ecology and those using the lake for fishing and recreational purposes. Muskegon Lake has been identified as an "Area of Concern (AOC)" under the Great Lakes Restoration Initiative Program. According to the USEPA GLNPO website (http://epa.gov/glnpo/aoc/muskegonlake lindex.html): In 1985 Muskegon Lake was designated an AOC because of water quality and habitat problems associated with the historical discharge of pollutants into the AOC, and the potential adverse effect the pollutants could have on Lake Michigan. The high levels of nutrients, solids, and toxics entering the lake had caused a series of problems including nuisance algal blooms, reduced oxygen in the lake's deeper water, tainted taste of fish due to petroleum products in the water, and contaminated sediments. The pollutant discharges also were suspected of contributing to the degradation of benthos (bottom-dwelling organisms, also referred to as the benthic community), the contamination of fish, and the reduction in fish and wildlife habitat. In addition, the development of chemical, petrochemical, and heavy industries was causing localized groundwater contamination that was moving toward the lake and its tributaries.

The Beneficial Use Impairments to Muskegon Lake have included beach closings, restrictions on fish and wildlife consumption, eutrophication or undesirable algae, restrictions on drinking water consumption, or taste and odor, degradation of fish and wildlife populations, degradation of aesthetics and benthos, restrictions on dredging, and loss of fish and wildlife habitat. The restoration and appropriate development along the Lake's waterfront is vital to restoring its health as well as that of the community. Even though there are well publicized advisories on fish consumption, many of Muskegon's poorest

inhabitants regularly fish local waters to provide food for their families.

According to a 2013 Mlive article, John Riley, AOC coordinator for the Michigan Office of the Great Lakes, said "Mercury will remain a concern for fish eaters, because it is ubiquitous in fish no matter where it comes from – one of the unfortunate results of the contaminants released by coal-fired power plants." While some of the Beneficial Use Impairments have been removed, the long history of contamination in Muskegon Lake and its food chain have represented an environmental exposure for decades. Cumulative effects from coal combustion at the power plant, a former pulp paper mill on the shoreline, a combat tank manufacturing operation, and coal gas plant, among other industries, affected air quality, shoreline sediments and groundwater creating potential health hazards to residents, tourists, and wildlife.

1.b Impacts on Targeted Community

Contaminants at the identified sites in the target community include chlorinated solvents, lead and other heavy metals, PNAs and petroleum VOCs. These contaminants can be linked to health effects such as cancers, blood lead levels, and asthma. The City of Muskegon fares worse in several health and welfare indicators than State averages, including mortality rates due to asthma, cancer rates, childhood blood lead levels and other related risk factors. The hazardous environmental conditions present in this area are likely to have an impact on sensitive populations such as children and pregnant women. In a 2010 study by the Michigan League of Human Rights 56.7% of children ages one to two tested positive for lead exposure and 11.5% of these children had elevated blood lead levels over 5 ug/dl. 9.2% of babies born in Muskegon have low birth weight (<5 lbs) (Kidscount.org). According to the Center for Disease Control and Prevention, many environmental conditions play a role in low birth weight including exposure to air pollution, lead, solvents, and pesticides - all chemical byproducts of the current and historic industrial practices in this area. Muskegon County Health Department data shows that City and County residents are slightly more at risk to cancer and asthma related affects than other Michigan citizens. Diabetes-related mortality rates are significantly higher.

Health and Welfare Information				
	City of Muskegon	Muskegon County	State of Michigan	
Cancer death rate per 100,000 people (2012)	N/A	185 ¹	174.3 ¹	
Percentage of deaths from cancer (2012)	22.7%1	23.0%1	22.8%1	
Children 1-2 years old with elevated blood levels (2012) 5 ug/dl	11.5%2	5.6% ²	4%2	
Diabetes related mortality rate (2010 – 2012)	N/A	108.6	76.1	
Hospitalization rate due to asthma per 10,000 people- childre 0-17 (2012) ¹	N/A	12.6	11.8	
Emergency Department Visit for Asthma	N/A	27.9%	27.2%	

1Michigan Department of Public Health Profiles; 2 KidsCount Data Center

Unfortunately, sensitive groups such as minorities, children and impoverished families are more susceptible to these impacts. Using, 52.1% of all children in the County are covered by Medicaid compared to the State of Michigan average of 40.8%. 79.2% of all births in the County were paid for my Medicaid compared to 44% for the State of Michigan KidsCount Data Center. These data show that the welfare of residents in the County and target community is negatively affected more than the average Michigan citizen. Brownfields in the target community impact public health due to the ongoing exposures to contaminants from uncontrolled sites, and negatively impact the welfare of citizens due to the disinvestment, the lack of jobs and sustainable incomes that result from unproductive properties. This impact is demonstrated by the poverty rates and low income rates in the target community.

Mapping data for the City of Muskegon shows 8.54 violent crimes per 1,000 persons in the target community compared to a State rate of 4.55/1,000 persons. The presence of uncontrolled brownfield

properties provides safe haven for these activities.

59.6% of Muskegon County children are eligible for free or reduced price lunch compared to a State average of 48.6%. These data indicate potential for malnourishment or poor dietary habits. The USDA Food Access Research Map indicates all of Census Tract 04200 is a food desert (Low Income and Low Access at one and 10 miles). The lack of multiple healthy and accessible food options for the target community contributes to health conditions such as obesity, diabetes and its complications. The higher diabetes mortality rate in the County is evidence of this possible connection. Brownfield redevelopment projects that bring increased access to healthier food choices can bring a transformational change to the target community.

The data show the relationship between the presence of brownfields and a target community disproportionately impacted by adverse health impacts, poverty, crime, and unemployment.

1.c Financial Need

1.c.i Economic Conditions

The loss of productive property and personal income has negatively impacted the City's tax revenues over the last decade. Between 2008 and 2010, the City's income tax revenue dropped by 48% and as of 2012 had not returned to pre-2008 levels, and property valuations across the City declined by about 20% (City Assessing records). This decline and increased vacancies negatively affect the City's tax revenues, resulting in a net revenue loss of \$6.8 million over the past four years. Similarly, property tax revenues have decreased resulting in an annual loss of \$500,000 to \$1,000,000 in revenues since 2008. This has severely limited the City's ability to provide funding for assessments, cleanup, demolitions, or further brownfield redevelopment initiatives. The previous redevelopment efforts by the City of Muskegon in the target community required a large bond to complete the necessary work. This debt was secured with the existing and future tax revenues from properties within the target community. Thus, traditional brownfield financing programs such as tax increment financing are not a viable tool to help spur redevelopment. Additionally, the State's traditional sharing of sales tax revenues has diminished significantly over the years, leaving the City to fund an increasingly greater share of its operating expense.

One of the City's largest employers and taxpayers, Consumers Energy (owner of the B.C. Cobb power plant), will close in 2014, and lay off 116 of their employees. This will result in a \$4 million dollar loss in property tax revenue for the City of Muskegon – 10% of the City's property tax revenues. The power plant is slated for demolition in April of 2016 and will leave vacant 300 acres of potentially contaminated property next to Muskegon Lake, streams, and wetlands. This will in essence, create the single largest Brownfield Property in the County, and one of the larger brownfields in the State. The loss of income from

this site will be a tremendous adverse economic impact to the City.

The cumulative result is that the City, working through its Brownfield Redevelopment Authority (Authority), lacks local funding sources to contribute to the assessment and cleanup planning needed to continue the redevelopment effort in the target community – transforming the lakeshore and downtown area from an industrial corridor into a vibrant downtown lakefront community.

1.c.ii Economic Effects of Brownfields

The identified Brownfields in the target community detract from investment in the community. As described above, the City of Muskegon has seen a net loss in property valuations city-wide. The identified

Brownfield sites are vacant or underutilized and produce little if any tax revenue. To implement the transformation of Muskegon's downtown, many became publicly owned and are thus tax exempt. The reduced tax base further diminishes the City's capacity to provide municipal services. The economic impact has been a net loss in revenue of \$6.8 million over the past four years.

The Brownfield sites were once productive properties and the source of jobs for local residents. As the properties sit vacant and unused, they provide no immediate opportunity for residents to alter their employment or income status. The condition of the sites and unknown environmental risks detract from business investment that often chooses to expand outside the core urban area, and retail and commercial establishments build in suburban commercial corridors occupied by strip malls. The vacant industrial buildings in the target community are not attractive to modern manufacturing operations as they lack the free space, ceiling heights and other amenities. The lack of investment impacts property values and does nothing to combat the poverty and unemployment of the area. The result is a loss of jobs that are accessible to the neighborhood citizens, unemployment, and widespread poverty. Disinvestment has also created depressed property values, vacancies, and blighted conditions. Muskegon's civilian labor force has lost about 7,583 workers since 2007 (20% of the City's population) and the significant number of lost jobs have hit the poorest neighborhoods the hardest. Worker Adjustment and Retraining Notification (WARN) data for the City of Muskegon indicate three mass layoffs and two manufacturing plant closings since 2008 resulting in a loss of 817 manufacturing jobs from these five events alone. There have been many other smaller layoff events in the City not required to file WARN notification. The loss of jobs and the exodus of workers have had a dramatic financial impact on City revenues, budgets and its ability to provide services. As detailed by the economic data above, the increased property vacancies and unemployment caused by brownfield sites creates a substantial loss in annual revenues to the City. The impact of the Consumers Energy Power Plant closing has yet to be fully understood. A 10% loss of property tax revenue is expected which will surely affect City programs across a variety of services.

The decline of manufacturing in Muskegon has contributed to the creation of brownfields and an adverse economic impact including an increase in unemployment. According to the Michigan Department of Technology, Management and Budget (MDTMB), unemployment rates in Muskegon rose sharply from 8.5% in April 2008 to 14.1% in December that same year. This increase was attributable to widespread layoffs, particularly in the manufacturing sector. Over the past five years unemployment rates at the City level have consistently been above State and National averages, reaching 20% in both July 2009 and January 2010. Unemployment rates in the target community remain significantly higher than elsewhere in the community. This is in part due to the lack of opportunity for jobs within the target community. Brownfield sites that were once the source of jobs to the neighborhood are now home to criminal activity, arson or blight, which further strain the City's limited service capabilities.

2. Project Description and Feasibility of Success

2.a Project Description 2.a.i Project Description

The City of Muskegon and its Authority have developed a vision and a Strategic Plan for the downtown business district and waterfront (the target community) through the development of City Plans, Master Plans, Area-Wide Plan, Downtown Lakeshore Plan, and Waterfront Redevelopment Plans, all of which have involved a planning component related to redevelopment of brownfield industrial sites. Since 2004, the City of Muskegon and the Authority have been implementing a strong coordinated effort to transform the downtown and former industrial waterfront properties. These efforts have included razing large industrial properties, relocating a major highway (Business U.S. 31), constructing a 14-mile non-motorized multi-use trailway along the shoreline, demolishing a 23-acre downtown mall site, renovating and demolishing numerous downtown buildings, realigning traffic patterns, reconstruction of roads, and upgrades to sewers, water mains, and other utilities. The City of Muskegon essentially created a blank canvas of several hundred acres on which to rebuild its downtown and connect the historical center of Muskegon to the shoreline of Muskegon Lake.

The rebuilding effort is a well thought-out plan developed through a concerted public outreach effort and over 20 years of strategic planning. The vision for a revitalized "new" Muskegon downtown is a modern urban center that showcases the lakefront shoreline, embraces the City's past and incorporates

historical buildings, provides the modern amenities of an urban waterfront - entertainment, mixed use development, open spaces, public access to the waterfront and provides new jobs and investment.

The Authority intends to use this Assessment Grant to continue the City's downtown and waterfront property redevelopment efforts. Specific priority sites include the Former Mall Site – a 40-acre footprint of partially developed land once occupied by an assemblage of commercial and retail buildings that have been demolished. There are numerous available lots associated with the former Mall that the Authority will assess and market. Previous studies have shown area-wide fill and groundwater contamination issues that affect these properties. The W. Clay Avenue Former Dry Cleaner has been for sale and local developers have evaluated it for mixed use, but perceived environmental risks have stalled any plans. Extensive site characterization will be needed to support residential re-use or mixed use. The redevelopment would provide a significant housing opportunity in the downtown neighborhood and would likely create additional market support for existing and future merchants in the target community. Several waterfront projects are envisioned including the relocation of a public access point at the 19-acre Fisherman's Landing Parcel, which consists of a deep-water port and ample waterfront space. The City wishes to make better use of the deep-water port and local businesses would be interested in expanding onto this property. Public access would be moved to another port site on the waterfront – potentially a property associated with the former pulp paper mill. Other waterfront properties are available for development, all having real or perceived contamination from former industrial operations and/or fill material. Grant funds will be used to help developers secure liability protection and assess properties to evaluate human exposures, necessary engineering controls or land use restrictions, evaluate cleanup options, and develop technical and financial plans to address the brownfield conditions

We also propose to use a small portion of funds for cleanup planning activities associated with the planned closure of the *B.C. Cobb Power Plant* – a large industrial property on the shoreline of Muskegon Lake. Cleanup planning activities will help the City and its citizens understand property conditions, provide input into future land use goals, help find resources to leverage redevelopment, and assist in a smoother transition to the future land use – minimizing the amount of time the land sits vacant or unused. This effort may involve technical review, sharing such information in a non-technical manner with neighborhood groups, community charettes to solicit input and ideas from the community about the future use of the site, and compiling and documenting this information.

In addition to these high priority sites, we envision eight to 10 additional projects on smaller downtown/waterfront properties. The types of redevelopment projects typically encountered in the target community include repurposing abandoned industrial sites for mixed commercial use with residential lofts, supporting new construction on prepared lands in the core downtown business district, and new waterfront construction. The assessments typically completed give liability protection to new owners and operators and provide clear plans for how redevelop a site – taking into account as necessary management of excess contaminated soils generated through construction activities, stormwater control, detailed plans for installation of vapor intrusion barriers, surfacing to prevent contact with contaminated soil, and other necessary controls.

2.a.ii Timino

For the priority sites, there are no impediments to implementation of the planned project activities using the Assessment Grant. Property access is readily available. The Authority has environmental service providers under contract with the City that have been selected through a competitive process. If additional contractor procurement is needed, it will be acquired in compliance with 40 CFR 30, 31, and 33 requirements as applicable. Site selection processes have been developed using the City Plans, Master Plans, Area-Wide Plan, Downtown Lakeshore Plan, and Waterfront Redevelopment Plans as guideposts for identifying priority sites and development projects. The Authority is an **established team**, headed by the City's Economic Development Director, Cathy Brubaker-Clarke, who is experienced and capable of implementing the anticipated projects using the Assessment Grant. Executive Support is provided by the City Manager Frank Peterson who has consistently ensured that the Authority maintains a priority on redeveloping the downtown and its waterfront. Based on the planning activities completed to date, anticipated project needs and developer needs, we believe that full and efficient use of the funds will be accomplished during the three-year grant period.

2.a.iii Site Selection

A Brownfield inventory has already been developed. In an effort to prioritize and select sites for use of assessment funds, we will utilize site prioritization criteria, solicit nominations from neighborhood groups, and seek developer interest in the inventoried sites. **Priority will be given to assessment of development-ready projects within the target area** with specific and feasible development plans ready for implementation. Projects that will be funded will be those that create economic investment and jobs, foster additional investment in the target area, provide residential opportunities and/or help meet other components of the Downtown/Lakeshore Redevelopment Plan or the Waterfront Redevelopment Plan. Priority would likely be given projects that augment earlier Brownfield successes, and to those that can demonstrate substantial job creation and capital investment. Established evaluation criteria include eligibility, site access, redevelopment potential, job creation, value creation, project need, fit with community plans, developers' ability to leverage additional funds, sustainability practices, public access to waterfront, and other factors. Access will be secured through access agreements negotiated by either the Authority or developers seeking to purchase property (i.e., Purchase Agreements).

2.b Task Description and Budget Table

2.b.i Task Description

Task 1: Phase I Environmental Site Assessments: \$25,000 from each budget

This Task will involve the completion of ESAs following ASTM and All Appropriate Inquiry standards utilizing qualified environmental consultants. The Budget estimates eight (8) Phase I ESAs funded by each Grant (16 total), at an average cost of \$3,000. Within this task, eligibility requirements, AAI checklists, ACRES reporting, and other such requirements are also completed.

Task 2: Phase II ESAs and Liability Protection: \$150,000 from each budget

Environmental assessment of soil, groundwater, and vapor intrusion as necessary at each site will be completed. For certain sites with appropriate levels of contamination, Baseline Environmental Assessments (BEAs) for liability protection and Due Care Plans to address "continuing obligations" following MDEQ guidelines as agreed in the *Brownfield Memorandum of Understanding* between EPA and the State of Michigan will be completed using a qualified environmental consultant. This task also will include the preparation of a Quality Assurance Project Plan, (QAPP), Sampling and Analysis Plans, and development of Health and Safety Plans. The budget assumes up to 16 Phase II ESAs split evenly between both funding sources at an average cost of \$18,750.

Task 3: Cleanup Planning: \$20,000 from each budget

A portion of this task budget will focus on efforts to understand, shape, and communicate potential future land uses of the B.C. Cobb plant. The funds will also be used to prepare tax increment capture plans (Brownfield Plans) for eligible environmental cleanup activities, Redevelopment Plans, Conceptual Site Plans and other documents that help determine and communicate future land use controls, construction and development related challenges, costs and obligations for a safe redevelopment project. Funds within this task may also be used to secure leveraged funds or support from the MDEQ, Michigan Strategic Fund, and other programs and agencies that can support the redevelopment. \$20,000 will come from both the Petroleum and Hazardous Substances Assessment Grant funds to support these activities.

Task 4: Community Outreach, Programmatic Expenses & Travel: \$5,000 from each budget This task involves activities related to community outreach including:

• Prepare for, attend and participate in public hearings, Brownfield Redevelopment Authority meetings, City Council meetings and Neighborhood Association meetings. Conduct outreach events to inform the public, realtors, developers and interested parties about the Grant and benefits of brownfield redevelopment. Additional community-focused interaction with neighborhood groups, authoring updates for their newsletters, create and disseminate brochures about brownfield redevelopment and other outreach activities; host community sessions to communicate redevelopment progress and secure input for equitable and sustainable development outcomes (e.g., considering end uses for properties, design charettes, community involvement and job opportunities); Registration and travel to the National Brownfield Conference and other pertinent educational and training events. (\$1,000 travel).

2.b.ii Budget Table Hazardous Substances Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Phase II ESAs and Liability Protection	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel					
Fringe Benefits					
Travel				\$ 1,000	\$ 1,000
Equipment					
Supplies		- -			
Contractual	\$ 25,000	\$ 150,000	\$ 20,000	\$ 4,000	\$199,000
Other	-				
Total	\$ 25,000	\$ 150,000	\$ 20,000	\$5,000	\$200,000

Petroleum Assessment Grant

Budget Categories	Task 1 Phase I ESAs	Task 2 Phase II ESAs and Liability Protection	Task 3 Cleanup Planning	Task 4 Community Outreach, Programmatic Expenses & Travel	Total
Personnel					
Fringe Benefits					
Travel				\$ 1,000	\$ 1,000
Equipment					
Supplies					
Contractual	\$ 25,000	\$ 150,000	\$20,000	\$4,000	\$199,000
Other					
Total	\$ 25,000	\$ 150,000	\$20,000	\$5,000	\$200,000

2.c Ability to Leverage

The Authority will seek funding from a variety of viable resources to leverage the Assessment Grant monies. When a specific development opportunity is present that brings new investment and tax revenues. State programs are available to assist. The Authority can secure grant or loan funds from the MDEQ. These funds can be used for assessment and cleanup activities. Funds are awarded on a competitive basis with up to \$1,000,000 available in both grant and loan funds. The Michigan Strategic Fund provides grant and loan funds to pay for demolitions, asbestos abatement, infrastructure, and other site improvements through its Community Revitalization Program. These funds are extremely competitive and funding is need-based. The Authority can also use funding from the City's Community Development Block HOME funds, HUD Neighborhood Stabilization Program (NSP) funds or private sources. The State of Michigan has established a new Brownfield Revolving Loan Fund to provide loans for cleanup and assessment activities. This fund is currently not accessible; if within the grant period funds become available, we will seek to understand where that program can leverage the assessment grant. Where tax increment financing (TIF) can be employed, the Authority will evaluate such options. However, the entire Target Community is already enrolled in a tax increment capture district to pay bonds used to reconfigure the downtown area and thus, tax increment in the target community has already been leveraged for brownfield redevelopment and is being used to repay existing debt. \$11.87 million in total bonds have already been issued to complete the previously described downtown redevelopment, and the estimated annual payment on these four bonds beyond 2013 averages \$775,000 secured primarily from property taxes and a \$100,000 appropriation. The existing debt and our relatively poor economic condition make it extremely difficult to offer additional leveraged funds from the tax increment.

Where there is program and site overlap, funding may be leveraged through Great Lakes Initiative funded projects for waterfront improvement, U.S. Economic Development Administration (EDA) funds, Transportation Enhancement grants through Michigan Department of Transportation, America Great Outdoors Initiative Funds (Urban Waters Initiative) to support projects with public access to water bodies or trails, Michigan State Housing Development Authority programs for downtown residential projects, and other programs.

The West Michigan Shoreline Regional Development Commission is a federal and state designated regional planning and development agency. Through their efforts over \$10 Million in state and federal funds have been brought into the community for shoreline restoration, cleanups of drain outfalls and storm water management improvements. Our work with this Assessment Grant to restore value to those

same lands represents a collaboration and leveraging of state and federal funds.

For assistance in the Cleanup Planning, we may seek assistance from the Technical Assistance for Brownfield Communities (TAB) programs to help engage the public.

We have also been successful in leveraging support from the State through use of its USEPA Section 128(a) funded Brownfield Assessment program. These funds were used in 2013 to complete environmental assessment activities (incremental sampling) for a large waterfront residential development project. We will continue to look for the State's support from this program.

The Authority may also seek support from the Community Foundation for Muskegon County. The Foundation's priorities include projects that enhance the downtown, protect and restore green spaces, shorelines, dune areas and wildlife habitat, and they have supported several projects of this nature.

3 Community Engagement and Partnerships

3.a Plan for Involving Targeted Community and Other Stakeholders and Communicating Project Progress

3.a.i Community Involvement Plan

This project is the continuation of a long-term City effort to transform its downtown and waterfront, which began with many years of public outreach that helped create the plans that direct the transformation today. The public's input into land use, design, traffic patterns, neighborhood needs, as well as the "look and feel" of the City have been critical in defining the transformation. The Authority will continue and build upon the ongoing public outreach efforts of the City as it implements this grant.

Engagement with residents in the target community will be accomplished through our partnership with the two Neighborhood Associations located in the target community – The Nims Neighborhood Improvement Association and The Nelson Neighborhood Association. Both groups convene on a regular basis and provide the Project Team an opportunity to meet with residents to discuss concerns and understand their desires for neighborhood improvement. Both post and print newsletters and have existing and operating networks to broadcast information and notices to citizens living in the target area. We will also use traditional public meetings to share information, web sites, social media, and the news media.

The business community in the target area and City at large will also be involved to ensure they are informed of redevelopment opportunities on brownfield sites and the potential incentives available through the Authority. The Muskegon Lakeshore Chamber of Commerce, Downtown Muskegon Development Corporation, Downtown Muskegon Now as well as the City Government will help us connect developers, local business expansions, etc. with the redevelopment opportunities and incentives for brownfield redevelopment.

We will utilize the neighborhood newsletters distributed via e-mail and at local establishments, social media (Facebook, Linkedin, Twitter), the City's website, and the websites of our community partners to share information, progress updates, opportunities, etc.

Our efforts to conduct cleanup planning activities for the B.C. Cobb power plant closing will include a number of activities involving the public and business community. We intend to evaluate the expertise of TAB in assisting in this effort. We envision meeting with neighborhood associations and business organizations to discern the most desirable uses for the land. The City is interested in a use that maintains a deep-water port, but the size (300 acres) provides ample opportunities for a variety of land uses and enhancements to the waterfront. Cleanup planning may use design charettes, an itemization of environmental threats and redevelopment challenges, and conceptual land use plans. Depending on how

this work progresses, it may be possible to post such content on various websites, thereby enhancing the public's opportunity to contribute to the vision for this land.

There are no significant language barriers in Muskegon and the above described various means of communicating with the affected community are believed to be effective. We will continue to monitor the effectiveness of communications and respond to any substantive ideas from neighbors and partners on better ways to communicate success and engage the affected community.

3.a.ii. Communicating Progress

Communicating progress of the grant and grant-funded activities will be conducted using the same means and channels described above. The Authority regularly tracks various metrics (outcomes) of the redevelopment projects it supports. These metrics are required to be reported annually to the Michigan Strategic Fund. Data includes level of investment, job creation, tax increment collected and disbursed, number of square feet of new construction or residential rehabilitation, and the amount of public infrastructure created. These data are uploaded onto a publicly available database maintained by the State. The annual reports are available locally to the public through the Authority. Throughout the grant, we will track additional metrics related to environmental expenditures, assessment activities, cleanup activities, etc. that are uploaded into USEPA's ACRES database and reported in Quarterly Reports. These reports are also publicly available. Through the public's access to these data and implementation of the Community Involvement Plan, there are ample opportunities to share progress and program successes with the community and demonstrate the effectiveness of the grant activities.

3.b Partnerships with Government Agencies 3.b.i Local/State/Tribal Environmental Authority

The Authority enjoys a strong active partnership with the MDEQ. MDEQ staff has a role in reviewing eligibility of petroleum-contaminated sites, reviewing work plans for redevelopment and/or cleanup and ensuring compliance and consistency with guidelines and regulations. For some of the most complicated projects, MDEQ will assist the Authority in evaluating opportunities for leveraging assessment grant funds with a grant and/or loan through the State's Brownfield program. Where U.S. SBA lending programs require State oversight or approval of cleanup plans, MDEQ staff will review such plans for conformity with State guidelines and effectiveness in protecting human health and the environment. Since the beginning of this transformational project, MDEQ has been a key partner, providing some of the earliest funding, visiting key sites, interacting with property owners, developers, and the community.

3.b.ii Other Relevant Governmental Partnerships

Other federal and state programs and agencies (HUD, Michigan State Housing Development Authority, Great Lakes Initiative, Michigan Coastal Management Program, National Oceanic and Atmospheric Administration, U.S. Department of Commerce) have all played a role or been partners in the City's planning, marketing, and coordination of the area-wide redevelopment effort. Michigan Works for Muskegon and Oceana County is an instrumental partner in helping connect local citizens with work opportunities and job training within the business community. This organization provides job search services, career building assistance, training, skills assessment and youth services that all help provide a talented work force to an expanding business. Where redevelopment occurs in this project, the Authority will seek input and assistance from Michigan Works to find workers (particularly from within the neighborhood) that can compete for new jobs created by the business, or as a result of environmental cleanup or new construction that will occur as part of the redevelopment. We will make such information available to the public through our efforts with the Neighborhood Associations. Through this partnership we have hopes that the affected community will be connected to the redevelopment projects and the real opportunities for increased employment and earnings.

In 2011, an interlocal agreement was put into place with several area municipalities (Kent County, City of Grand Rapids, City of Wyoming, Cascade Township, City of Muskegon, and Muskegon County), two economic development organizations (The Right Place, Muskegon Area First), and in conjunction with the Gerald R. Ford International Airport. The resulting **West Michigan Economic Development Partnership** is used to spur development of strategic properties for business that use two or more modes of transportation. One focus is to redevelop properties within the Target Community that would utilize the deep-water ports in Muskegon Lake. The Michigan Economic Development Corporation (MEDC) recognizes this partnership and provides additional resources to market these properties on a national and

global scale. These global marketing efforts from the State will broaden the audience that could potentially use these waterfront properties.

The MEDC and its Michigan Strategic Fund (MSF) provide numerous brownfield redevelopment incentives related to non-environmental issues such as demolition, asbestos abatement, public infrastructure needs, and site preparation. Involvement is focused on traditional urban core projects such as those in the target community. Their involvement and support would include review of Work Plans to provide the State's portion of tax increment revenues to a redevelopment project. The MEDC also administers the Community Revitalization Program, providing performance-based grants and loans to projects in traditional downtown areas. MEDC also provides access to other State and federal funds such as Community Development Block Grant funds, technical assistance, planning activities (such as housing studies), and a plethora of programs and incentives to support community development and brownfield redevelopment. Their role is critical as it helps leverage funds for the cost of non-environmental activities associated with the redevelopment projects. MEDC has also assisted the City of Muskegon in evaluating downtown sites for status as "Redevelopment Ready." Once certification is achieved, communities with solid development projects receive priority for funding at the MEDC. The MEDC also assists in marketing a certified community's top three Redevelopment Ready Sites.

We also plan to reach out to TAB and/or the Agency for Toxic Substances and Disease Registry to assist in community/site planning and communications with the public. We are aware of the role TAB and ATSDR can play to assist us in visioning success for the re-uses of the B.C. Cobb power plant site.

3.c Partnerships with Community Organizations 3.c.i Community Organization and Description

Nelson Neighborhood Improvement Association (NNIA) and Nims Neighborhood Association

The Nelson Neighborhood Improvement Association and the Nims Neighborhood Associate are located in downtown Muskegon and specifically in the target community. These groups will work with the Authority to address local concerns and target specific properties and projects for action. Both meet on a monthly basis and those meetings are open to all neighborhood citizens. Such meetings will be key to disseminating project information to citizens and soliciting their ideas. In addition, we can utilize their newsletters to broadcast updates and progress to citizens.

Downtown Muskegon Now

Downtown Muskegon Now is a strong and long-time partner with the City's downtown transformation project. Their role in the project is to help the City create development opportunities in the downtown. Downtown Muskegon Now has helped brownfield redevelopment efforts by packaging incentives such as façade improvement grants and tax abatements to bring such projects into the downtown.

Downtown Muskegon Development Corporation (DMDC)

The DMDC will provide marketing support for the Authority's brownfield redevelopment projects in the downtown area. DMDC is the owner of the former downtown mall, one of the priority sites for this grant. As an owner, the DMDC has several design requirements for new property owners to ensure development is consistent with existing strategic and land use plans. As caretaker for this large priority site, their efforts in maintaining the property as a clean, secure, development-ready site is also important. *Muskegon Lakeshore Area of Commerce*

The Muskegon Lakeshore Area of Commerce is one of the primary organizations for existing businesses within the target community and the City at large. The Chamber's role in the project is to help the Authority communicate to existing business the opportunities and incentives to development within the target community. Their regular meetings and newsletters also serve as an effective means of communicating with the business community. The Chamber supports using site assessment funds for additional brownfield cleanups and believes that it is pivotal in improving the local environment, strengthening West Michigan's largest port, and creating job growth. The Chamber will contribute to the program by providing its marketing resources to broadcast information and solicit input from the downtown business community.

3.c.ii Letters of Commitment

Letters of Commitment from the Community Organizations are attached to this proposal package.

4 Project Benefits

4.a Health and/or Welfare and Environment

4.a.i Health and/or Welfare Benefits

A primary focus of this project is an improvement to the welfare of citizens in the City of Muskegon and specifically the target community. We believe the transformation of downtown Muskegon provides significant and accessible opportunity to residents in the neighborhoods most affected by the historic disinvestment. The redevelopment provides access to jobs and because of the proximity of these neighborhoods, the jobs are accessible to those lacking transportation choices. Increased earnings improve the welfare of citizens, helping to eliminate poverty, identified as a Community Need. The welfare of citizens is also improved as blighted buildings are re-used or removed, eliminating a negative impact on housing values, removing areas that house criminal activity, and removing safety and environmental hazards that may impact local residents, particularly children. Thus, one of the benefits of brownfield redevelopment would be lower crime rates in the area and improved housing values, thus increasing the appeal of the neighborhood to additional investment by businesses and other residents.

Redevelopment of the target properties effectively helps reduce the public's exposure to contaminants through fencing, engineered covers over contaminated soils, and other controls. The reduced sources of pollutants would be expected to have **positive health benefits** on lowering cancer rates, asthma-related hospitalizations and blood lead levels amongst citizens. These were identified as key health impacts associated with brownfields in the target community.

impacts associated with brownfields in the target community.

It was identified that the target area is classified by USDA as a "food desert." As such, there is a defined need for improved choices and accessibility to healthy foods. Brownfield redevelopment provides opportunities for those types of businesses to locate in the target community. One example of the City's efforts to address the absence of food choices in the area was to relocate the Farmers Market to the core downtown and construct a structure to make the market a year-round venture. This has improved the access of fresh fruits and vegetables to the target area. The test kitchen at the Farmers Market provides a location and support for entrepreneurs with food-based business ideas. The improved food choices provide positive health benefits and will help combat issues such as diabetes-related illnesses identified as a key health issue in the target community.

4.a.ii Environmental Benefits

Through assessment, cleanup, and redevelopment activities, it is reasonable to expect improved environmental conditions. Developments will incorporate land use and engineering controls that effectively eliminate vapor intrusion conditions and contact with contaminated soils. As sites are redeveloped, potential sources of contaminants to groundwater plumes and area-wide impacts may be discovered and removed. Sources such as underground storage tanks, petroleum-saturated soils, old stormwater control features, etc. will be removed to make way for safe and effective redevelopment. Improved stormwater controls at sites will improve the quality of stormwater runoff directly into Muskegon Lake. Continued improvement to this public infrastructure and the elimination of sources of contaminated sediments benefits the ecology and use of the lake. As many local residents fish for sustenance, improving the quality of the Lake is an important environmental and public health goal. Assessment data will also eliminate the "perceptions" of environmental impact that exists at so many sites. Improved environmental data helps evaluate cleanup needs at these properties and helps spur redevelopment.

4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

4.b.i Planning, Policies, and Other Tools

The rebuilding efforts to date have integrated sustainable practices including the re-use of infrastructure (roads, sewers, water mains) and integration of low impact stormwater controls. These practices will continue as the rebuilding effort advances. The City and DMDC encourages developers to integrate "green elements" into projects. Examples of such on brownfields in the target area include the Vida Nova Condominium and the Michigan Alternative and Renewable Energy Center (MAREC) both LEED certified developments. MAREC was the first newly constructed facility in Michigan, and the 10th building in the country, to receive LEED "Gold Certification." The City supports the use of renewable energy technologies on brownfield properties through partnership with MAREC who provides information and resources to interested parties who wish to incorporate energy efficient components into their buildings. The Authority provides educational materials to developers on demolition material re-use, deconstruction techniques, riparian buffers, stormwater management techniques, etc. that help redevelopment projects

provide environmental benefits to the community. We encourage heavy equipment contractors to use noidle policies on their diesel-powered equipment to reduce emissions.

Policies and programs exist, managed by the MDEQ, for projects near surface water ensuring that stormwater created at construction sites does not enter surface waters without retention or treatment.

4.b.ii Integrating Equitable Development or Livability Principles

The transformation of downtown Muskegon has allowed the City to incorporate various principles of Smart Growth, Livability and New Urbanism. This is evidenced by the construction of a 14-mile-long trail system connecting the downtown area with parks, dunes, campgrounds, and marinas on the shores of Lake Michigan. The trail supports pedestrian access to attractions, dining options, festival sites, and housing throughout the City. The enhanced walkability of the City provides ease of access to jobs, commercial sites, and entertainment options for those living in the target community.

In 2013 the Downtown Muskegon Development Corporation donated four parcels of property in the target area to the City of Muskegon for the development of a seasonal open air farmers market. The relocation of the market to the core downtown has provided the target community with increased access to healthy food choices.

Previous downtown developments have incorporated a variety of housing options from affordable to market rate. Affordable housing continues to be a strong market for new construction and brownfield redevelopments providing housing options may expand the availability of such housing.

4.c Economic and Community Benefits (long term benefits)

4.c.iEconomic or Non-Economic Benefits

The economic benefit of brownfield redevelopment to residents will be manifested in jobs, increased employment opportunities, lower unemployment rates, and higher per capita incomes. Based on our previous experience with downtown and waterfront projects, each of the redevelopment projects would be expected to create 10 - 20 new jobs. Over the grant period this project could result in a total of 250 – 300 new jobs. Even at the relatively low annual wage of the existing median household income (\$18,839), these jobs would create an additional \$5.65 million in annual wages for the local work force. This new job creation would effectively lower Muskegon's unemployment by a full percentage point.

Another economic development benefit is the increased tax revenues secured by the City through new construction projects which would be expected to increase by an average of \$10,000 per project per year. By the end of the grant period, the additional <u>annual</u> tax revenues that could be realized from brownfield redevelopment projects would be \$160,000. The City has invested significantly in the downtown redevelopment efforts to date paid for by issuance of bonds. The debt burden on the City would be alleviated by increased revenues which free funds for other potential public improvements and public services. We expect 12-16 redevelopment projects in the **target area** that, based on similar projects, would generate a minimum of \$16,000,000 in investment.

4.c.ii Job Creation Potential: Partnerships with Workforce Development Programs
Michigan Works for Muskegon and Oceana County is an instrumental partner in helping connect local
citizens with work opportunities and job training within the business community. This organization
provides work force development, job search services, career building assistance, training, skills
assessment and youth services that all help provide a talented work force to an expanding business. There
is no specific environmental job training programs in Muskegon. Muskegon Community College and Baker
College provide educational programs for in-demand careers and are available to assist employers in work
force development and training. When brownfield redevelopment projects create job opportunities, we
intend to broadcast that information to the Nims and Nelson Neighborhood Associations along with
employer requirements and available training programs that help connect citizens with these opportunities.
We will also ensure that businesses experiencing growth are aware of the programs and incentives
available for work force development and training.

5 Programmatic Capability and Past Performance

5.a Programmatic Capability

If awarded, the Authority's dedicated staff will be directly responsible for the implementation and management of the Hazardous Substance and Petroleum Assessment Grant. It includes the Project Director, Cathy Brubaker-Clarke. Ms. Brubaker-Clarke has served as a Planning Director, then as a Director of Community and Economic Development for the City of Muskegon. She has managed several grants over the years for the City of Muskegon including a FY2009 U.S. EPA Assessment Grant (00E93301). She has extensive experience with all aspects of grant implementation, and currently serves as the Director of a division that includes Economic Development, Planning, Zoning, Environmental Code Enforcement, Rental Housing Inspections, Leisure Services, and Community and Neighborhood Services (administration of HUD grants). Ms. Brubaker-Clarke is also actively involved in several organizations in the City of Muskegon including the Michigan Alternative and Renewable Energy Center, Sustainability Coalition, Downtown Muskegon Now and the Muskegon Rotary Club. Ms. Brubaker-Clarke also develops and implements economic development and brownfield redevelopment programs, as well as staffs the Downtown Development Authority, Brownfield Redevelopment Authority, and Planning Commission. With this broad economic development experience and expertise Cathy is able to utilize the City's and Authority's resources to successfully engage developers, packaging multiple resources, incentives, and programs together to successfully complete complex brownfield redevelopment projects.

Additional executive support to meet this goal is provided by the City Manager Frank Peterson, who has consistently ensured that redeveloping the downtown and its waterfront is a priority, and to the extent possible ensures funding to support these initiatives. The City's most recent budget includes funding to support the Community & Economic Development (\$299,261) which is sufficient to provide staff support for a wide range of services. Additional City Departments provide historical resources, aerial photography, GIS data, utility information, etc. Should there be employee turnover, Mike Franzek (Planner III and Zoning Administrator) would step in. Support from the City Manager's office and the Finance Department could

also be increased if it were necessary.

Other key members include the Downtown Muskegon Development Corporation, the landowner of the Former Mall Site and a key player in downtown redevelopment efforts. DMDC also brings expertise in packaging incentives and developing successful strategies for complex brownfield redevelopment projects.

The MDEQ District staff routinely engages in technical and financial assistance, and liability issues related to specific projects. Additionally, the Authority has access to two private consulting firms under contract with the City of Muskegon and can access these professionals for technical expertise beyond that provided by the City and MDEQ. These consultants offer a wide range of technical service, experience and business acumen to assist in a successful Brownfield Program. Acquisition of professional services for this grant will be acquired in compliance with 40 CFR 30, 31, and 33 requirements as applicable.

As the Authority and the City of Muskegon are not new to brownfield redevelopment, they have developed processes for evaluating projects, engaging developers, accessing multiple incentives, policies, and other tools that allow them to function effectively. This will allow the Authority to quickly implement the

grant and make effective use of the funds during the three year grant period.

5.b Audit Findings

The Authority has never received adverse audit findings.

5.c Past Performance and Accomplishments

5.c.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

1. Purpose and Accomplishments

The City of Muskegon Brownfield Redevelopment Authority has not received U.S. EPA funding but has received other federal or non-federal assistance agreements:

- A 1994 \$1,000,000 State of Michigan Site Assessment Fund to undertake environmental assessments of 21 properties along the Muskegon Lake shoreline. These properties were assessed and all project activities were completed in a timely manner.
- A 1998 State of Michigan Site Reclamation Grant for \$448,000 to assess and cleanup the former Anaconda Industries site for redevelopment by Cole's Quality Foods. The assessment of

this waterfront brownfield site to allow for a \$2.5 million expansion of Cole's (a manufacturer of

frozen garlic bread) created 27 jobs.

A 2000 State of Michigan Waterfront Redevelopment Grant for \$2,311,418 to help pay for infrastructure upgrades and improvements at brownfield sites within the target community. Grant funded activities were completed in a timely manner and the infrastrucuture upgrades were installed.

A 2002 State of Michigan Clean Michigan Initiative Redevelopment Grant for \$1,000,000 to pay for environmental response activities at the former Teledyne/Continental Motors plant along the Muskegon Lake Shoreline. Redevelopment of this area included new construction of the LEED certified Grand Valley State University Michigan Alternative and Renewable Energy Center and the Parmenter-O'Toole Law Offices

In 2011 the County of Muskegon was selected to receive technical assistance from the USEPA through the Building Blocks for Sustainable Communities program as part of the Partners for Sustainable Communities initiative (PSC). The specific Building Blocks assistance focused on Using Smart Growth to Produce Fiscal and Economic Health. The City of Muskegon was a Core Partner in this grant for technical assistance provided to Muskegon County. Cathy Brubaker-Clarke was the representative for the City of Muskegon and its various Departments including the Brownfield Redevelopment program. The technical assistance focused on a broad range of smart growth principles that have been employed in the planning, design, and construction of downtown Muskegon. As part of this effort Ms. Brubaker-Clarke and representatives from Muskegon County, Convention and Visitors Bureau, and the City of Muskegon Heights City Manager attended the Sustainable Communities Leadership Academy (SCLA) workshop in Denver in October 2012.

2. Compliance with Grant Requirements

The Authority has complied with the various State Assessment and Redevelopment Grant Guidelines, including timely reporting, quarterly updates, disseminating outcomes (jobs, investment, acres redeveloped) to the State. All above noted grants were fully expended and outcomes were delivered to community members, as well as through websites, newspapers, and during public outreach events.

Appendix 3 Assessment Other Factors Checklist

Name of Applicant:	City of Muskegon Bro	wnfield Redevelo	pment Authority

Please identify (with an \mathcal{X}) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	Community population is 10,000 or less	
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing	
	significant community economic and environmental distress.	
X	Project is primarily focusing on Phase II assessments	7-8
	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
	Community experienced manufacturing plant/power plant closure(s) (2008 or	5
X	later) tied to the targeted brownfield sites or project area, including	And
	communities experiencing auto plant/power plant closures due to bankruptcy	attached
	or economic disruptions.	
	Recent (2008 or later) significant economic disruption (unrelated to a natural	
	disaster or manufacturing/auto plant/power plant closure) has occurred within	
	community, resulting in a significant percentage loss of community jobs and	
<u> </u>	tax base.	
	Applicant is one of the 12 recipients, or a core partner/implementation strategy	
	party, of a "manufacturing community" designation provided by the Economic	
	Development Administration (EDA) under the Investing in Manufacturing	
	Communities Partnership (IMCP). To be considered, applicants must clearly	
	demonstrate in the proposal the nexus between their IMCP designation	
	and the Brownfield activities. Additionally, applicants must attach	
	documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient's IMDCP proposal which	
	lists/describes the core partners and implementation strategy parties. A core	
	partner/implementation strategy party is a local partner	
	organization/jurisdiction that will carry out the proposed strategy, as	
	demonstrated in letters of commitment or memoranda of understanding which	
	demonstrated in fetters of communicity of memoranda of understanding which	<u> </u>

	documents their contributions, roles, and responsibilities to the partnership.	
	EDA may provide to EPA a list of the core partners/implementation strategy	
	parties for each of the 12 "manufacturing community" designees, which EPA	
	would use to verify this other factor.	
	Applicant will serve an area designated as a federal, state, or local	
	Empowerment Zone or Renewal Community. To be considered, applicant	
	must attach documentation which demonstrates this current designation.	
	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for	
	Sustainable Communities (PSC) grant funding or technical assistance that is	
	directly tiued to the proposed Brownfields project, and can demonstrate that	
	funding from a PSC grant/technical assistance has or will benefit the project	15 and
X	area. Examples of PSC grant or technical assistance include a HUD Regional	attached
	Planning or Challenge gant, DOT Transportation Investment Generating	
	Economic Recovery (TIGER), or EPA Smart Growth Implementation or	
	Building Blocks Assistance, etc. To be considered, applicant must attach	
	documentation.	
	Applicant is a HUD Promise Zone community. To be considered, applicant	
	must attach documentation.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning Grant.	

				Employees Lost Due
Company Name	City	Date Received	Incident Type	to Layoffs
Eagle Alloy	Muskegon	10/1/2012	Mass Layoff	133
Yale Lift-Tech	Muskegon	02/17/2010	Mass Layoff	89
Yale Lift-Tech	Muskegon	08/17/2009	Plant Closing	269
Sappi Paper	Muskegon	03/06/2009	Plant Closing	236
Mahle Clevite	Muskegon	1/9/2008	Mass Layoff	90

WARN (Worker Adjustment and Retraining Notification) Data from 01/01/2008-12/17/2014

Plant closing: A covered employer must give notice if an employment site (or one or more facilities or operating units within an employment site) will be shut down and the shutdown will result in an employment loss* for 50 or more employees during any 30-day period.

Mass layoff: A covered employer must give notice if there is to be a mass layoff which does not result from a business closing, but will result in an employment loss* at the employment site during any 30-day period for 500 or more employees, or for 50-499 employees if they make up at least 33% of the employer's active workforce.

^{*}Michigan Department of Technology, Management and Budget

Screenshot from U.S. EPA website:

http://www.epa.gov/smartgrowth/buildingblocks.htm#afromgrantees

Communities Selected in 2011

In 2011, EPA selected 32 communities from two sources to receive Building Blocks assistance.

- **Complete Streets**: McKinney, Texas; Nashville/Davidson, Tennessee; Portland, Maine; and Wichita, Kansas.
- Preferred Growth Areas: Bluffton, South Carolina; Ranson, West Virginia; and Rockport, Texas.
- <u>Smart Growth Guidelines for Sustainable Design and Development</u>: Hellertown, Pennsylvania; Kayenta Township, Arizona; Oak Ridge, Tennessee; and Syracuse, New York.
- Smart Growth Zoning Codes for Small Cities and Rural Areas: Cambridge, Maryland; Essex, Connecticut; Reedsburg, Wisconsin; and Spencer, North Carolina.
- Sustainable Land Use Code Audit: Dover, New Hampshire; Granville, Ohio; Lincoln, Nebraska; and Shelburne, Vermont.
- Using Smart Growth to Produce Fiscal and Economic Health: Bemidji, Minnesota; Chelmsford, Massachusetts; Deerfield Beach, Florida; Erie County, New York; Muskegon, Michigan; and Pike's Peak Council of Governments, Colorado.
- · Walking Audit: Helena, Montana; Renton, Washington; and St. Louis, Missouri.
- Linking Land Use to Water Quality: Fitchburg, Wisconsin, and Jersey Shore, Pennsylvania.

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The City of Muskegon was a Core Partner in this grant for technical assistance provided to Muskegon County. Ms. Cathy Brubaker-Clarke was the representative for the City of Muskegon and its various Departments including the Brownfield Redevelopment program. The Technical Assistance focused on a broad range of smart growth principles that have been employed in the planning, design, and construction of downtown Muskegon.

Threshold Criteria for Assessment Grant

City of Muskegon Brownfield Redevelopment Authority, Michigan

1. Applicant Eligibility

The City of Muskegon Brownfield Redevelopment Authority is a redevelopment agency that is fully sanctioned by the State of Michigan under the authority of Public Act 381 of 1996, the Brownfield Redevelopment Financing Act. Documentation of eligibility is provided below:

The City of Muskegon Brownfield Redevelopment Authority was established by resolution in 1997, and its establishment filed with the Secretary of State on August 4, 1997. The City of Muskegon Brownfield Redevelopment Authority was established under the statutory authority of Michigan's Public Act 381 of 1996, as amended. It is governed by a Board of 11 members.

2. Letter from the State of Michigan

The City of Muskegon Brownfield Redevelopment Authority received a letter from the Michigan Department of Environmental Quality (MDEQ) acknowledging the Authority's plan to conduct assessment activities through the pursuit of Federal grant funds. Please refer to attached letter.

3. Community Involvement

The City of Muskegon Brownfield Redevelopment Authority (Authority) will be **engaging residents and businesses** located in the target community to ensure that decisions being considered by the Authority address their concerns and provide local citizens opportunities to benefit from the redevelopment. Engagement with residents in the target community will be accomplished through our partnership with the two Neighborhood Associations located in the target community – The Nims Neighborhood Association and The Nelson Neighborhood Association. Both groups meet on a regular basis and provide us an opportunity to meet with residents to discuss concerns and understand their desires for neighborhood improvement. Both groups post newsletters and have existing and operating networks to broadcast information and notices to citizens living in the target area. We will also utilize traditional public meetings to share information, web sites, social media, and the news media.

The business community in the target area and City at large will also be involved to ensure they are informed of redevelopment opportunities on Brownfield sites and the potential incentives available through the Authority. The Muskegon Area Chamber of Commerce, Downtown Muskegon Development Corporation, Downtown Muskegon Now as well as the City Government will help us connect developers, local business expansions, etc. with the redevelopment opportunities and incentives for brownfield redevelopment.

One priority for our community will be the future of a large coal-fired power plant (B.C. Cobb) scheduled for shutdown in 2015. This shut-down will open up large tracts of lake-front property. The City of Muskegon is interested in a use that maintains a deep-water port, but the size of the land (300 acres) provides ample opportunities for a variety of land uses and enhancements to the waterfront. Our efforts to conduct cleanup planning activities for the B.C. Cobb plant could involve a number of activities involving the public. We intend to evaluate the expertise of TAB in assisting in this effort. We envision meeting with neighborhood associations and business organizations to find out what the most desirable uses for the land might be. Cleanup planning may use design charettes, an itemization of environmental threats and redevelopment challenges, and conceptual land use plans. We would post such content on various websites enhancing the public's opportunity to contribute to the vision for this land.

4. Site Eligibility and Property Ownership Eligibility
Since this application is a community-wide proposal, this section is not applicable



STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





DAN WYANT DIRECTOR

December 2, 2014

Mr. Frank Peterson City Manager City of Muskegon 933 Terrace Street Muskegon, Michigan 49443

Dear Mr. Peterson:

SUBJECT: Acknowledgment Regarding the United States Environmental Protection Agency

Brownfield Grant Proposal

Thank you for your notice and request for a letter of acknowledgment for the city of Muskegon Brownfield Redevelopment Authority's (MBRA) proposal to the United States Environmental Protection Agency's (EPA) brownfield grant program. The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), encourages and supports local redevelopment efforts. The information you have provided regarding your assessment grant proposal has been reviewed and determined to be of benefit to the citizens of Michigan.

The MBRA plans on applying for a \$200,000 hazardous substances assessment grant and a \$200,000 petroleum assessment grant, which could be used to conduct environmental investigation activities at eligible hazardous substances and petroleum brownfield sites in the city of Muskegon. The MBRA is considered eligible for this award as an economic development agent of a local unit of government.

Should the EPA award the grant to the MBRA, it would support assessments at numerous brownfield sites, allowing redevelopment of underutilized and contaminated properties, and improving the economic development and environmental conditions throughout the city. If further assistance is needed please contact Mr. Ronald Smedley, Brownfield Redevelopment Coordinator, RRD, at 517-284-5153, or you may contact me.

Sincerely.

Carrie Geyer, Chief

Carrie & Le

Brownfield Redevelopment Unit

Remediation and Redevelopment Division

517-284-5182

cc: Ms. Linda Mangrum, USEPA Region 5

Mr. David Stegink, Envirologic Mr. Ronald Smedley, DEQ



December 15, 2014

Dear Ms. Brubaker-Clarke,

We are writing the City of Muskegon Brownfield Redevelopment Authority (CMBRA) on behalf of the Nims Neighborhood Association and its residents. We are fully aware of the CMBRA's efforts to redevelop the waterfront and downtown districts and to include our Community Group because the Nims Neighborhood spans the southern border of both of Muskegon Lake and the western portion of Downtown.

As the president of the Nims Neighborhood Association, I have worked closely with the CMBRA in their efforts to address environmental justice concerns and to redevelop key economic hubs in the community. Although our mantra is to address problems, enjoy positive results or just get together to have fun and socialize, we value improvements that benefit the community and address the needs of the Nims group while tackling larger community issues.

In addition to supporting the efforts of the CMBRA to redevelop the target area sites, we understand there are continuously environmental issues brought up during Neighborhood meetings and through our social media channels. As a small population, adjacent to the Fisherman's Landing Site and downwind of the B.C. Cobb Power Plant, and unknown issues related to downtown properties we are disproportionately exposed to these issues.

I have lived in the Nims Neighborhood for 18 years, and been a part of the Neighborhood Association, working to improve the neighborhood and the City. Given this, I would like the U.S. EPA to consider the voice of a Neighborhood to support the efforts of the CMBRA and provide funding to understand these negative environmental issues that worry community members and take away from the charm of the neighborhood.

We will commit to attending planning sessions, promoting redevelopment of a community in need, and making sure that the Community has stake in redevelopment opportunities, and is fully aware of the threats that the Brownfield Sites in our Neighborhood pose.

Respectively,

Shuley Strang

President of the Nims Neighborhood Association

Dear Ms. Brubaker-Clarke,

The Nelson Neighborhood Improvement Association (NNIA) would like to extend our support to the City of Muskegon Brownfield Redevelopment Authority in their efforts to secure Brownfield Assessment grant funding in the City of Muskegon, and specifically, in the Downtown.

The CMBRA has approached Nelson Neighborhood because we are located in the heart of the City of Muskegon. Our Community contains the entire downtown area and is bounded to north by Muskegon Lake, east by Terrace Street, and south by Laketon Avenue. Our Neighborhood association understands that the assessment grant funding will be used to assess, market, and redevelop prime spots along the lakeshore and downtown. Many of the sites that have been identified by the Authority are located adjacent to residential neighborhoods. Threats from unknown environmental issues worry community members and detract from redevelopment potential in our vibrant downtown community.

We are on the front lines of a long history of environmental issues related to paper plants, powerplants, dry cleaner, gas stations, and unknown environmental issues due to contaminated fill materials that all of our waterfront developments currently sit on. We look at these funding opportunities as ways to create an economic incentive downtown, advance our trail systems, create additional residential space, and work with the City to address our needs as a small group of residents who want see a better, safer place to live, work, and play.

The NNIA's mission is to become an agent of change empowering the community to maintain and improve the quality of life, plan for the future, and encourage good relationships among residents, agencies, houses of worship, and businesses of our neighborhood. Our association meets on the 3RD Wednesday of every month with other meetings scheduled throughout the year including: park cleanups, block parties, dumpster day and holiday home tours. We keep our residents and community members informed through social media and post updates on the City of Muskegon's website. We will use this process to keep our residents informed about projects and secure input for the Authority.

Please consider this support letter as input from community members that will directly benefit from any progress made in the target area.

Sincerely.

Greg Borgman, President (Nelson Neighborhood Improvement Association)



December 12, 2014

Cathy Brubaker-Clarke, Economic Development Director City of Muskegon 933 Terrace Street Muskegon, Michigan 49443

Re: FY2015 U.S. EPA Hazardous Substances and Petroleum Assessment Grant Application

Dear Mrs. Brubaker-Clarke:

I am writing in support of the City of Muskegon Brownfield Redevelopment Authority's proposal for a U.S. EPA Brownfield Assessment Grant.

The Downtown Muskegon Development Corporation (DMDC) in 2002 took a calculated risk to purchase the former Muskegon Mall site. We believe this acquisition was central to the rebirth of downtown Muskegon. Since the purchase and demolition of the former downtown mall site we have been selling the individual parcels for private development. Our projects included nine redevelopment projects totaling over \$42 million in investment. Past U.S. EPA Assessment Grant funds available from the City helped us construct a new year-round Farmers Market facility in the heart of downtown. The assessment funds were critical to that project and helped leverage financial support from the State of Michigan.

As we continue to sell lots on the former mall site, site assessment funds are an invaluable tool. These funds are needed as a tool to actively promote and sell additional property downtown. There is a need to continue this program. The Downtown Muskegon Development Corporation would like to provide our full support the Brownfields Assessment Grant. If approved by the U.S. EPA, the resulting site assessments funds will allow for additional brownfield redevelopment and cleanup in the downtown Muskegon area, making it easier for the Downtown Muskegon Development Corporation to continue the positive development that is underway. We pledge our full support to provide property access to these sites, market the availability of funds to developers, and support your community outreach efforts.

Sincerely,

Jonathan Sexforth, Executive Director

Downtown Muskegon Now

p: 231.724.3180 f: 231.728.7251 **380 W.** Western Ave, Ste 202 Muskegon, MI 49440 downtownmuskegon.org





December 12, 2014

Cathy Brubaker-Clarke, Economic Development Director City of Muskegon 933 Terrace Street Muskegon, Michigan 49443

Re: FY2015 U.S. EPA Hazardous Substances and Petroleum Assessment Grant Application

Dear Mrs. Brubaker-Clarke

I am writing in support of the Brownfields Assessment Grant proposal for the City of Muskegon Brownfield Redevelopment Authority.

Our passion is Muskegon and our drive is to create a downtown community that is inviting for businesses, residents, commuters, tourists and anyone else who comes to our community. We do this by encouraging new development while also helping to preserve historic sites and green space. Downtown Muskegon Now is a non-profit organization seeking to revitalize downtown Muskegon using the patented 4 point Downtown Muskegon Now approach, created by the National Trust for Historic Preservation. One of the four points is Economic Restructuring, which involves rebuilding the economic base of downtown Muskegon.

Downtown Muskegon Now has worked with numerous developers over the last few years to package incentives such as facade grants and tax abatements for business locating downtown Muskegon. In addition to the above mentioned tools, previous brownfield assessment grant funds have been an extremely valuable tool. As previous funds have been fully utilized, additional funds are needed as tools to actively help rebuild the economic base of downtown Muskegon.

Downtown Muskegon Now would like to provide our full support for the Brownfields Assessment Grant for the Authority. If approved by the U.S. EPA, the assessment grant funds will allow for new redevelopment opportunities not only in the downtown area, but also in our adjacent Lakeshore or waterfront district, making it easier for Downtown Muskegon Now as we continue our economic restructuring activities.

Sincerety.

Joriathan Seyferth, Executive Director

∖ Døwntown Muskegon Nov

p: 231,724,3180 f: 231,728,7253 **380 W. W**estern Ave, Ste 202 Muskegon, MI 49440 **dow**ntownmuskegon.org





380 W. WESTERN AVE - STE 202 - MUSKEGON, MI 49440 - P. 231,722,3751 - F. 231,728,7251 - MUSKEGON,ORG

APPRECIATE YOUR BUSINESS

December 15, 2014

Cathy Brubaker-Clarke, Economic Development Director City of Muskegon 933 Terrace Street Muskegon, Michigan 49443

Dear Mrs. Brubaker-Clarke,

The Muskegon Lakeshore Chamber of Commerce fully supports the City of Muskegon Brownfield Redevelopment Authority (CMBRA) in their efforts to receive U.S. EPA Brownfield Assessment Grant Funding.

We see the target areas identified (Downtown Muskegon and Lakeshore) as prime areas for redevelopment because of the deep-sea ports, marinas, and general access to Muskegon Lake and Lake Michigan. We are excited that the CMBRA will also own the parcels downtown that have been identified in our target areas and will provide aggressive marketing when the sites are redevelopment ready.

Our goal is to help facilitate proper business decisions and sustain an environment through community leadership, promotion of inclusive business advocacy and value member service. With more than 1,100 business members the Chamber of Commerce serves as a hub for Muskegon Area Businesses for economic development services. We are thrilled to see the Lakeshore and Downtown target area being developed and anticipate growing interest from developers and believe that the assessment grant funding will help prepare sites for re-use.

If approved by the U.S. EPA, the funds will allow the CMBRA to tackle some of the most problematic brownfield properties in the City; thus improving our local environment, strengthening West Michigan's largest port and allowing for additional private development and in turn job growth, that may not otherwise occur.

Cindy Larsen-President

Muskeron Lakeshore Chamber of Commerce